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December 7, 2018

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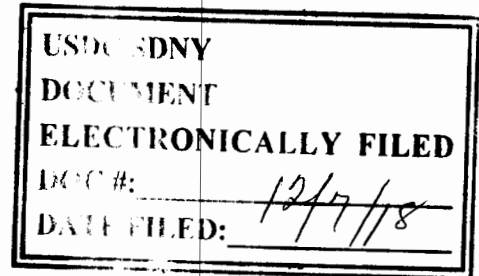
The Honorable Victor Marrero
United States District Judge
500 Pearl Street, Suite 1040
New York, NY 10007

Re: *Coventry Capital v. EEA*, No. 17-cv-07417(VM)(HBP)

Dear Judge Marrero:

I write on behalf of Plaintiff Coventry Capital US LLC ("Coventry") to respectfully request that the Court rule on Coventry's pending motion for a preliminary injunction, which has been held in abeyance pending the parties' discussions about the prospects for settling this litigation. As counsel for Coventry stated during the October 19, 2018 hearing on the preliminary injunction motion, Coventry was "more than happy" to explore the possibility of resolving this case on mutually acceptable terms. Dkt. No. 90 at 25:3-6. At the Court's direction, Coventry attempted to engage Defendants in such discussions. As set forth in Coventry's October 29, 2018 letter to the Court, Defendants' response was that "[p]rior to considering any mediation, the Defendants request that Coventry provide them with a settlement proposal and suggested framework." Dkt. No. 89, Ex. 1. Since then, Coventry repeatedly has requested from Defendants basic, updated information about the underlying portfolio of life insurance policies—the composition and economics of which have changed materially since the parties' dealings in 2017—as would be necessary to allow substantive settlement discussions to begin. This includes updated life expectancies and medical records for the insureds, updated premium illustrations, and other information that Coventry would need before making a bid. Defendants have refused these requests, and it is clear that further requests would not be productive.

Coventry therefore requests that the Court now rule on Coventry's motion for a preliminary injunction. We appreciate the Court's attention to this matter and are prepared to address it further at the Court's convenience.




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Respectfully submitted,


Kenneth J. Brown

cc: Counsel of record (by email)

<i>Defendant is</i> directed to respond	
by <i>12-12-18</i>	by letter not to exceed <i>two</i>
<i>(2)</i>	pages, to the matter set forth above by
<i>plaintiff</i>	
SO ORDERED.	
<i>12-7-18</i>	
DATE	VICTOR MARRERO, U.S.D.J.